

13 MARCH 1947

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13 MARCH 1947

I N D E X  
of  
EXHIBITS

| <u>Doc.</u><br><u>No.</u> | <u>Def.</u><br><u>No.</u> | <u>Pros.</u><br><u>No.</u> | <u>Description</u>        | <u>For</u><br><u>Ident.</u> | <u>In</u><br><u>Evidence</u> |
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1 Thursday, 13 March 1947

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3  
4 INTERNATIONAL MILITARY TRIBUNAL  
5 FOR THE FAR EAST  
6 Court House of the Tribunal  
7 War Ministry Building  
8 Tokyo, Japan

9 The Tribunal met, pursuant to adjournment,  
10 at 0930.

11 - - -

12 Appearances:

13 For the Tribunal, same as before with the  
14 exception of: HONORABLE MR. JUSTICE NORTHCROFT,  
15 Member from the Dominion of New Zealand, not sitting,  
16 as of 10:45 A. M.

17 For the Prosecution Section, same as before.

18 For the Defense Section, same as before.

19 - - -

20 (English to Japanese and Japanese  
21 to English interpretation was made by the  
22 Language Section, IMTFE.)  
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1 MARSHAL OF THE COURT: The International  
2 Military Tribunal for the Far East is now in session.

3 THE PRESIDENT: All the accused are present  
4 except OKAWA, TOJO and ARAKI, who are represented by  
5 their respective counsel. We have certificates  
6 from the prison surgeon at Sugamo certifying to the  
7 illness of the accused TOJO and ARAKI, and stating  
8 that those two accused will not be able to attend  
9 the trial today.

10 Some time ago we were asked by Mr. Logan,  
11 defense counsel, to refer to chambers the question  
12 of framing rules for the examination of defense wit-  
13 nesses. Mr. Logan expressed the hope that an agree-  
14 ment might be reached with the prosecution on such  
15 rules. The Tribunal without any dissent agreed to  
16 adopt Mr. Logan's suggestion. The parties met in  
17 chambers before me and came to an agreement, to which  
18 I did not make one single contribution. However,  
19 I ventured to congratulate the parties on the measure  
20 of agreement they had achieved.

21 I realize they were called upon to draft  
22 a set of rules that would insure a just trial, and  
23 yet were expected, in the interests of a speedy trial,  
24 to depart from rules shaped to secure a just trial  
25 by some of the ablest legal minds our respective



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1 countries have produced.

2 We have decided to give a trial to the rules  
3 agreed upon by the prosecution and the defense, but  
4 with misgivings. In the circumstances any set of  
5 such rules must be adopted with misgivings. However,  
6 we are sure we will have the cooperation of the prose-  
7 cution and the defense in endeavoring to make them  
8 work successfully.

9 It will, of course, be for the Tribunal to  
10 decide whether in any circumstances any adverse  
11 statement has been made by a witness called by one  
12 accused against another accused. In making such  
13 decision we shall be governed by recognized prac-  
14 tices.

15 Mr. OKAMOTO.

16 K I K U S A B U R O O K A D A, called as a  
17 witness on behalf of the defense, resumed  
18 the stand and testified through Japanese  
19 interpreters as follows:  
20

21 DIRECT EXAMINATION

22 BY MR. S. OKAMOTO (Continued):

23 Q In continuation I wish to have documents  
24 No. 841 and 842 handed to the witness.

25 (Whereupon, documents were handed  
to the witness.)

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DIRECT

1 MR. S. OKAMOTO: May I have read the last  
2 question and answer yesterday.

3 (Whereupon, the question and answer  
4 were read by the official court reporter as  
5 follows:

6 "Q Can you prove by quoting a passage or pas-  
7 sages from the document 841 that those plans were  
8 based upon peacetime -- small peacetime budgets?

9 "A Yes, I can. To begin with, under No. 4  
10 of the preface, these words are given: 'From the  
11 standpoint of controlling the pace of its execution,  
12 this outline shall depend firstly on the basis of the  
13 sixth war budget.'

14 "Next, on page 3, in the paragraph '1,  
15 Policy,' these words are given: 'In order to cope  
16 with the present situation and to establish the found-  
17 ation of our national defense powers accompanying the  
18 perfection of armaments' --

19 "I should like to explain this in detail.  
20 In 1936 the army believed that, in order to cope with  
21 Soviet expansion, it was necessary to complete -- to  
22 replenish military preparations in the six years be-  
23 tween 1937 and 1942. Within the army this was called  
24 'The Six Year Plan for Military Replenishment.' After  
25 negotiations with the Finance Ministry, the amount of

OKADA

DIRECT

1 the budget which the War Ministry had originally  
2 planned was cut, and the length of the years was  
3 lengthened by one year so that it became a seven  
4 year plan, and the total budget, thirty-three billion  
5 yen, which the Finance Ministry at the time gave in-  
6 formal consent -- to which. But this informal ap-  
7 proval was given on the understanding that -- for the  
8 actual spending of this money, discussions will be  
9 conducted on the basis of the actual situation year  
10 by year and after the whole thing had been presented  
11 to the Diet for approval.")

12 THE PRESIDENT: The witness should have re-  
13 freshed his memory before he came into court. There  
14 is no impropriety involved in doing so.

15 Q Are there any points to be corrected or  
16 altered in the questions and answers just given?

17 A There are. According to the record, it  
18 was said that thirty-three billion -- the budget  
19 was thirty-three billion yen. I said thirty billion  
20 yesterday. And I also said that the matter will be  
21 presented to the Diet yearly.

22 THE PRESIDENT: There is no need to reread  
23 the whole of the question and answer to make those  
24 corrections.  
25

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1 Q I wish you to make further explanations.

2 A With respect to the 30 billion yen budget,  
3 this was to be used in a period of seven years. But  
4 this was not formally approved by the -- officially  
5 approved by the Ministry of Finance nor officially  
6 approved by the Diet. In the army, however, this  
7 was taken for granted for the purpose of formulating  
8 a plan, and on the basis of this prepared various other  
9 plans.

10 THE MONITOR: Correction on the figures:  
11 30 billion should read 3 billion.

12 A (Continuing) The plan given in exhibit 841  
13 is one of them, and this was also formulated on the  
14 basis that it would be approved -- on the basis of a  
15 fixed budget. The passage in exhibit 841 saying this  
16 outline shall depend, firstly, on the basis of the  
17 fixed war budget, points to this very fact. In the  
18 year 1937 there is no other budget which was considered  
19 to be fixed, and it is impossible to think that the  
20 long-range budget covering the years 1937 and 1943  
21 was fixed.

22 Leaving matters with respect to documents at  
23 that point, I should like to refer to the attached  
24 sheet in regard to the matter of fixed budgets. I  
25 now refer you to Appendix 3, Part I. That is page 21

1 of the exhibit. I refer to the years 1936 to 1943  
2 with respect to army aircraft production. You will  
3 observe from the figures that the annual aircraft  
4 production in Japan for the army was, in 1936, 522  
5 planes; 1937, 745; 1938, 1500; 1939, 1450; 1940, 1390;  
6 1941, 1380; 1942, 1220; and in 1943, 1050. These  
7 figures cannot by any means represent any idea of  
8 world domination. It is clear that it is based  
9 upon a very small budget.

10 THE PRESIDENT: Brigadier Quilliam.

11 BRIGADIER QUILLIAM: May it please the Tribunal,  
12 it is submitted that the document must speak for  
13 itself. This witness can't interpret it.

14 THE PRESIDENT: No. Practically every day  
15 I state that we will not be influenced by opinions  
16 but only by facts. I shall continue to state it  
17 every day if necessary. But the prosecution's  
18 witnesses offended in that regard also, among them  
19 Mr. Liebert, to whom this witness is replying. But  
20 one offense doesn't justify another.

21 Q Mr. Witness, please do as Mr. President said.  
22 Will you please refrain from expressing any opinion  
23 here. Merely give us facts. Please continue your  
24 explanation.  
25

A For instance, in 1943 the total annual army



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DIRECT

1 aircraft production rose to 1505 in the month of  
2 August.

3 THE MONITOR: Instead of "annual" the witness  
4 said "monthly" production. Correction.

5 A (Continuing) Army aircraft production jumped  
6 in June 1944 to a monthly production of 1505.

7 Q In other words, your quotation from court  
8 exhibit 841 means that the figures quoted from court  
9 exhibit 841 is quite apart from the actual figures,  
10 the actual production; wartime production has no  
11 connection, is that what you mean?

12 A Yes. Another point that I wish to state,  
13 that in later years the production of aircraft has  
14 decreased. I wish to say the same with respect to  
15 Appendix 4 and Appendix 5.

16 Appendix 4 with reference to arms. Now,  
17 taking the year 1936 in arms production as 100, that  
18 represents 34 million yen. The index here shows that  
19 the highest point was reached in the year 1940 and  
20 thereafter there has been a gradual decrease, and  
21 when the index for the production of arms reached the  
22 highest point the amount in money was no more than  
23 66 million yen.

24 Now, referring to Appendix No. 5 with respect  
25 to the production of shells, the index reveals that

OKADA

DIRECT

1 the highest point was reached in the years 1941 and  
2 '42 and decreased thereafter.

3 Q Mr. Witness, I do not wish to interrupt, but  
4 I wish to remind you that should you speak a little  
5 more softly I think it would be easier to understand  
6 you.

7 A With respect to the production of shells as  
8 expressed in money, the highest point showed a cost  
9 of not more than 70 million yen annually. The years  
10 1941 and '42 represent the height of the war in the  
11 Pacific, and does not represent by any means a small  
12 production amount.

13 With respect to tanks, I shall dispense with  
14 details or heavy explanations.

15 Appendix No. 7 shows the wartime production  
16 of various types of arms -- monthly wartime production.  
17 If you would notice in this chart showing the monthly  
18 production of principal arms in wartime, the figure  
19 for tanks, including armored cars, is not more than  
20 fifty a month, in spite of the fact that this  
21 included plans for the promotion of tank production.  
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1 Q Referring again to court exhibit 841,  
2 do you wish to say -- do you mean to say that this  
3 preparation had no relation whatsoever with future  
4 wars?

5 THE MONITOR: That this plan had no relation  
6 whatsoever with any war in the future?

7 THE PRESIDENT: Here is another opinion. It  
8 seems hopeless to try to correct this position. We  
9 do not know the opinion is expressed until we hear  
10 the translation. I do not know how to overcome it at  
11 all. We must hold counsel responsible. These men are  
12 supposed to speak from a proof of evidence. Counsel  
13 is supposed to know everything they are going to say,  
14 that is, counsel examining them in chief, and counsel  
15 should eliminate opinions from the proofs of evidence.

16 MR. S. OKAMOTO: Mr. President, it may be a  
17 misunderstanding on my part but I was merely asking  
18 whether this court exhibit 841 refers to wars in the  
19 future; that is, the plans given in exhibit 841 were  
20 actually used or not in a war in the future.

21 THE PRESIDENT: He said they were not yester-  
22 day. He said they were abandoned after the China  
23 Incident, as you call it.

24 Q According to the statement given by the  
25 witness just now, the figures of annual budgets seem

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DIRECT

to decrease towards the end of the fiscal year;

1 why is this?

2 A It was merely planned in accordance with  
3 the arms replenishment plan and amounted to nothing  
4 more than that.

5 Q From court exhibit 841, appendix 3, part 1,  
6 we see there seems to be a considerable increase in  
7 emoluments; how do you explain this?

8 A The army plane production capacity in 1936  
9 was 700 planes. In 1937 the production was 745  
10 planes and in 1938, 1300 planes had to be produced;  
11 and therefore in 1938 unless the tank capacity were  
12 doubled, production of planes of that figure would  
13 be impossible.

14 Q Is your explanation ended?

15 A If necessary--

16 Q I do not particularly ask for further ex-  
17 planation. Should the demand decrease then, I believe,  
18 this word "expansion" is liable to cause misinter-  
19 pretation. What have you to say to this? Do you  
20 mean that there is some kind of a consciousness of  
21 war ahead?

22 A The decrease in use and demand is under due  
23 consideration and this is -- this meaning is well  
24 expressed in exhibit 841.  
25



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1 THE MONITOR: Should be well expressed.

2 For instance, in Manchuria there is a plan  
3 to meet depression, that is in the event of decrease  
4 in munitions production.

5 THE MONITOR: It is contained on page 4,  
6 item 5 in the Japanese text.

7 THE INTERPRETER: Will the Tribunal bear with  
8 the Language Section? It is very difficult to find  
9 passages, the passage referred to, because the page  
10 and the lines do not correspond.

11 THE PRESIDENT: The Tribunal is satisfied  
12 that you are not to blame.

13 THE INTERPRETER: Thank you, sir.

14 A (Continuing) I am referring to exhibit 841  
15 under "Outline of Expansion. (1) Building up on the  
16 Continent," an item to the following effect:  
17 "Countermeasures against depression and development  
18 of export measures." Whereas such countermeasures  
19 against depression have been taken in Manchuria, such  
20 measures were not taken in Japan inasmuch as there  
21 was a general expansion in the manufacturing industries;  
22 that in the event there should be any decrease in the  
23 demand of munitions or war materials the possibility  
24 of such depression could be countered by the fact that  
25 the general industries in Japan would be able to



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1 absorb the excess power. Whereas in Manchuria there  
2 were no government-managed arsenals, in Japan there  
3 were a number of such arsenals and government-owned  
4 factories so that in the event production decreased  
5 this would not necessarily lead to any reduction in  
6 civilian demand inasmuch as production by government-  
7 owned factories and arsenals could be decreased and  
8 protection given to civilian production enterprises.

9 THE PRESIDENT: Witness, would you speak  
10 softly, please? Apparently the interpreters are  
11 having some difficulty in understanding you.

12 A (Continued) With the decrease in the use of  
13 munitions goods it was anticipated that a depression  
14 in this industry would come around 1941 and 1942,  
15 and it is in the light of such an anticipation that  
16 in this plan, plans were made, countermeasures were  
17 considered insofar as the matter related to Manchuria.

18 Q According to court exhibit 841 is there any  
19 room for interpretation in this way that there was a  
20 civil -- civil organs to supplement any measures which  
21 were not actually covered by the military budget for  
22 national defense measures?

23 THE MONITOR: Correction: With regard to  
24 the plan given in exhibit 841, were there, aside from  
25 the military budget, plans for state protection of

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1 civilian production and industries? The witness  
2 replied "Yes."

3 A (Continuing) That was planned with refer-  
4 ence to the aircraft industry. In peace time the  
5 goal for army and navy aircraft production was 3000  
6 but the plan called for plant installations which  
7 would have the capacity to produce 10,000 planes and  
8 this plan was to be furthered through protective  
9 government measures. Reference to this matter is  
10 found in appendix 3, part 2. This shows that the  
11 plant capacity for peace-time production of aircraft  
12 was to be placed at 10,000 planes a year but that  
13 actual production was to be limited to 3000 planes  
14 a year and that the balance of the plant capacity  
15 unused was to be given government protection.  
16 However, this was not carried into effect.

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1 Q In so far as the aircraft production is  
2 concerned, it seems that this was a very big under-  
3 taking for Japan. What do you say was the motive for  
4 this -- what purpose?

5 A This was based upon fear and apprehension  
6 of Soviet expansion, and that it was the desire  
7 that even though the budget allotted for military  
8 purposes was a small one that the utmost Japan could  
9 do would be devoted to the promotion of the aircraft  
10 industry; but in the event of an emergency all efforts,  
11 however small, could be concentrated on the single  
12 point of increasing Japan's air power in meeting the  
13 situation.

14 Q In saying that this aircraft industry was  
15 projected as a measure of defense against Soviet  
16 Russia, can you point out any specific points in this  
17 court exhibit 841 with respect to this -- to prove  
18 that?

19 A Yes, I can. Yes, I refer to appendix No. 3,  
20 part 2: "Computation of objectives of expansion for  
21 airplane industry based on national policy measures.  
22 Estimation of wartime productive power." I should like  
23 to give an explanation of this part of the appendix.

24 THE PRESIDENT: Brigadier Quilliam.

25 BRIGADIER QUILLIAM: It is submitted, if it

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1 please your Honor, that the witness cannot explain  
2 the document; the document must speak for itself. The  
3 words are plain.

4 THE PRESIDENT: This witness, no doubt, acted  
5 upon instructions in preparing this plan. He can  
6 state the instructions he received. We do not assume  
7 for one moment that he was asked to size up Japan's  
8 position in the world and prepare plans to meet it.  
9 He received instructions undoubtedly. What were they?

10 The objection is allowed, subject to that.

11 A (Continuing): In the first year the  
12 total plane production goal was 12,866.

13 THE PRESIDENT: It is suggested by one of  
14 my colleagues that there was a conversation in  
15 Japanese which we did not hear. I could not say  
16 whether there was or not. Was there? If so, we  
17 should know what it was.

18 THE INTERPRETER: Yes, your Honor. We were  
19 inquiring of the witness to what part of the particular  
20 index he was referring to inasmuch as the Japanese  
21 chart has been made in such a manner that it is very  
22 difficult to locate the particular item.

23 A (Continuing): With respect to the division  
24 or sharing of this production of 12,866 planes, it  
25 was decided that the division between the army and

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1 the navy would be made in accordance with the army-  
2 navy mobilization agreement, and then, that with  
3 regard to the method of dividing this amount of  
4 planes, the division would be made between the  
5 principal operating force and the partially operat-  
6 ing force at the ratio 62 to 38.

7 BRIGADIER QUILLIAM: May it please the  
8 Tribunal, I suggest that what the witness is dis-  
9 cussing at the moment can have no relevance in this  
10 case whatever. I respectfully suggest that it has  
11 become obvious that the witness has taken charge of  
12 counsel, who is not really examining him at all, and  
13 therefore a great deal of time is being wasted over  
14 matters that are utterly irrelevant or, at any rate,  
15 have a very faint reference to this matter.

16 MR. S. OKAMOTO: Mr. President, I wish to  
17 add one word. The words of the prosecutor were un-  
18 called for because the testimony given by the witness  
19 now is in refutation of Mr. Liebert's very strong  
20 statements to the Court. By court exhibit 841 and 842  
21 Mr. Liebert said that -- claimed that this was a great  
22 preparation for the Pacific War -- for the China  
23 Incident and the Pacific War.

24 THE PRESIDENT: I will tell you again,  
25 without hope of achieving anything, that we are



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1 disregarding Mr. Liebert's opinions, and you need not  
2 cross-examine about them.

3 MR. S. OKAMOTO: I understand very well  
4 what Mr. President has just said. However, in view  
5 of the fact that the figures and the plans given in  
6 court exhibits 841 and 842 involve --

7 THE MONITOR: I understand the words of the  
8 President very well, but inasmuch as the plans,  
9 exhibits 841 and 842, involve very minute figures  
10 and detailed plans, I submit that it is necessary  
11 for the formulator and drafter of this plan himself  
12 to come to the Tribunal and explain the meaning and  
13 purpose of some of these items.

14 THE PRESIDENT: We will recess for  
15 fifteen minutes.

16 (Whereupon, at 1045, a recess was  
17 taken until 1100, after which the proceed-  
18 ings were resumed as follows:)

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1 MARSHAL OF THE COURT: The International  
2 Military Tribunal for the Far East is now resumed.

3 THE PRESIDENT: Major Moore.

4 LANGUAGE ARBITER (Major Moore): Mr. Presi-  
5 dent, with the Tribunal's permission, we submit the  
6 following language corrections:

7 Record page 18,275, line 15, read "1 billion  
8 57 million."

9 Line 16, the words of the interpreter should  
10 be corrected according to the above.

11 Record page 18,285, line 2, read "300  
12 million." Line 5, read "1 billion, 400 million."  
13 Line 7 and 8, read "2 billion."

14 Record page 18,286, line 12, delete  
15 "thirty."

16 THE PRESIDENT: Mr. OKAMOTO.

17 MR. S. OKAMOTO: On our part, it is not only  
18 our intention merely to refute the interpretation of  
19 exhibits 841 and 842 but, on the basis of the figures  
20 given therein, to prove that there was no aggressive  
21 intention on the part of Japan and that neither the  
22 China Incident nor the Pacific War was foreseen by  
23 Japan.  
24

25 THE PRESIDENT: Objection upheld. We do  
not want opinions from the witness. I do not think

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1 you fully appreciate the difference between a state-  
2 ment of fact and a statement of opinion. Maybe it  
3 does not count so much in Japanese courts as it does  
4 in other courts. That is readily understood. But  
5 you must acquire that understanding if you are to  
6 efficiently examine witnesses before this court.

7 In your summation you can ask the Court to  
8 draw the conclusions which you want the witness to  
9 give. There will be nothing to prevent you, looking  
10 at the figures, from inviting the Court to draw those  
11 conclusions.

12 MR. S. OKAMOTO: Mr. President, even in  
13 Japanese courts there is more emphasis laid on facts.

14 THE PRESIDENT: In this court emphasis is  
15 laid wholly on facts unless you have an expert in the  
16 box.

17 MR. S. OKAMOTO: Mr. President, if it be  
18 permitted to go into further details about the career  
19 about this witness, I believe it can be said that he  
20 is a very authoritative witness.

21 THE PRESIDENT: We refused to declare Liebert  
22 an expert. This subject does not call for expert  
23 testimony, not this particular section of it.

24 MR. S. OKAMOTO: I will reframe my question.  
25

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1 BY MR. S. OKAMOTO (Continued):

2 Q Court exhibit 841, Appendix 3, part 2.

3 THE MONITOR: We are inquiring as to the  
4 location of that passage referred to.

5 MR. S. OKAMOTO: The part which the wit-  
6 ness referred to a little while ago.

7 THE MONITOR: This is with respect to  
8 estimation of wartime productive power, Appendix 3,  
9 part 2.

10 THE PRESIDENT: Some means must be adopted  
11 to avoid this delay. This is dreadful. This morn-  
12 ing was the worst experience we have had. We may  
13 have to ask for an amendment of the Charter so far  
14 as broadcasting Japanese is concerned. It is not  
15 necessary in any trials in our national courts; it  
16 is not necessary in the interests of justice. It  
17 is done for propaganda purposes. Why couldn't you  
18 get this witness to swear an affidavit as you did  
19 in the case of other witnesses?

20 MR. OKAMOTO: We did prepare an affidavit.  
21 However, we could not get the translation out in  
22 time.

23 THE PRESIDENT: Well, wait until you can in  
24 the future,  
25

MR. S. OKAMOTO: We are more than half way



1 through, sir. Hereafter, I shall frame my questions  
2 in a very short form.

3 THE MONITOR: Inasmuch as we are more than  
4 midway in the course of the direct examination, I  
5 should like to frame my questions as briefly as pos-  
6 sible, omitting a number of points that I had in-  
7 tended to ask.

8 THE PRESIDENT: I hope that you will try  
9 to finish before lunch.

10 MR. S. OKAMOTO: I shall try.

11 THE PRESIDENT: The range of this man's  
12 evidence is such that you should have finished long  
13 ago.

14 MR. S. OKAMOTO: I was nearing the end of  
15 court exhibit 841, and I was just about to begin on  
16 842.

17 May I continue with the questioning?

18 THE PRESIDENT: That is what I want you to  
19 do.



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1 BY MR. S. OKAMOTO (Continued):

2 Q Referring to the last part of the Appendix  
3 Three, can you point out exactly the passage -- the  
4 exact passage --

5 THE MONITOR: Can you explain or prove by  
6 the use of figures that the plan was drawn up as a  
7 measure of defense against the Soviet Union?

8 A Yes. Speaking simply, I may speak of the  
9 Army as being the principal force to be used in the  
10 event of such an emergency and give the airplane  
11 production in that connection.

12 Q We will jump to Court exhibit 842. I  
13 understand that exhibit 842 consists of three parts.  
14 Will you explain the relevancy of it?

15 THE MONITOR: Why it is divided into three  
16 parts?

17 A Part Two was a plan drafted by the Ministry  
18 of War and presented to the Cabinet with a desire that  
19 it be materialized. This was the preparation for --  
20 the drafting of this was completed on May 29th and  
21 was tendered to the Diet the day after or immediately  
22 after.

23 The second part consists of materials to  
24 be used for reference purposes pointing out items  
25 which ought to be realized in connection with Part One;

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1 and we, ourselves, did not necessarily agree with  
2 some of the items set forth therein. Hence, it is  
3 designated as a tentative or draft plan of the  
4 Ministry of War and has not been officially submitted  
5 and was not officially submitted to the Cabinet.

6 Part Three consists of a plan drawn up by  
7 the Cabinet in accordance with the Army draft plan  
8 and was approved and decided upon by the Cabinet  
9 Council on January 17, 1939.

10 THE MONITOR: The correction was made in  
11 Japanese, but it is unnecessary in English.

12 A (Continuing): This became a -- this was  
13 given a Cabinet decision a year and half later and  
14 this is as a result of the outbreak of the China  
15 Incident. Although the Army plan called for a  
16 five-year plan, the Cabinet -- it was unavoidable that  
17 the Cabinet revised this plan as a four-year plan.  
18 In addition to these three divisions there was  
19 another plan formulated by the General Staff Office--  
20 another five-year plan prepared by the General Staff  
21 Office.

22 Q Referring to Part Three concerning the  
23 expansion of armaments--expansion of production, was  
24 Mr. YOSHINO, who testified here yesterday, Minister  
25 of Industry and Commerce at that time?

OKADA

DIRECT

1           A   He was not Minister of Commerce and Industry  
2 at the time the Cabinet decision was taken.

3           Q   Referring to Court exhibit 842, Part One,  
4 Summary of Five-Year Program of Important Industries,  
5 prepared by the War Ministry, was this ever submitted  
6 to the Cabinet?

7           THE MONITOR: No. Was it ever submitted  
8 to the Ministry of Commerce and Industry?

9           A   No. This plan was proposed to the Cabinet.

10          Q   Was Mr. YOSHINO, Shinji, Minister of  
11 Industry and Commerce then?

12          A   He was not invested as Minister of Commerce  
13 and Industry at the time this proposal was made.

14          Q   Referring to Part Two, Resume of Policy  
15 Relating to Execution of Essentials of Five Year  
16 Program of Important Industries, was this ever referred  
17 to the Cabinet?

18          THE MONITOR: Or to the various ministries?

19          A   This second part was not at any time offici-  
20 ally given -- presented to any governmental department;  
21 but I do recall that it was shown just merely for  
22 reference purposes to the competent departments in  
23 charge.

24          Q   However, did the Minister actually see this  
25 or not?



OKADA

DIRECT

1 A You mean the second, Part Two?

2 Q Yes, Part Two.

3 A I think that they, the Ministers, have not  
4 seen this plan.

5 Q Concerning the proposal of the General  
6 Staff, what attitude did the War Ministry take?

7 A At first the General Staff Office's  
8 Proposal for the Expansion of Important or Essential  
9 Industries, the War Minister gave it the cold shoulder,  
10 calling it a plan impossible of realization -- impos-  
11 sible of execution. I was the only person who  
12 ardently and fervently advocated the necessity of  
13 realizing the industrial expansion plan; and I recall  
14 that the time was around April, 1937. That was two  
15 or three months previous to the Lukouchiao Incident,  
16 that is the Marco Polo Bridge Incident.

17 Q What interest did Vice-Minister of War  
18 UMEZU take in this?

19 A With reference to which document?

20 Q Will you please state briefly the attitude  
21 of the War Ministry in general concerning the proposal  
22 made by the General Staff?

23 A Of course, the attitude was different  
24 depending on the time, but when the General Staff  
25 proposal was made the entire War Ministry save myself

OKADA

DIRECT

1 showed no interest in it. However, later on, after  
2 the War Ministry personnel began to realize that this  
3 was an important measure for the purpose of executing  
4 the national policy, the higher officials in the War  
5 Ministry including UMEZU became very positively  
6 interested in the materialization of the proposal;  
7 but with reference to exhibits 841 and 842 there is  
8 a difference in General UMEZU's attitude.

9 With respect to 841, purely military matters,  
10 he did not show any particular interest. At the time  
11 before the outbreak of the China Incident the War  
12 Ministry officials did not have any deep interest  
13 in the question of how to guide or lead the munitions  
14 industries.



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1           However, with respect to exhibit 842, inasmuch  
2 as the fact that its subject matter is quite political  
3 in nature it drew the attention of the officials in the  
4 War Ministry to the extent that in the end they became  
5 active supporters of the plan.

6           Q   Please state the reason for the general staff  
7           formulating an industrial plan?

8           A   At that time it was the general staff which  
9 felt most apprehensive in connection with the national  
10 power as well as military strength of the Soviet Union.

11           THE MONITOR: Strengthening --

12           THE INTERPRETER: Strengthening of the national  
13 power as well as the military power of the Soviet Union.

14           A   (Continuing) And furthermore, it was because  
15 modern national defense rested upon a strong industrial  
16 foundation.

17           The intentions embraced by the operational  
18 authorities vis-a-vis the industrial -- industry -- was  
19 the intention or ideas entertained by the operational  
20 authorities with respect to the expansion of industries.  
21 At that time the Chief of the Second Section of the  
22 General Staff Office was Colonel ISHIHARA, Kanji, who  
23 later became Director of the First Division of the  
24 General Staff and promoted at that time to the rank  
25 of Major General. General ISHIHARA was what might be

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1 called the first propelling force of the industrial  
2 plan and I have been frequently informed as to his  
3 intentions, both directly and indirectly. According  
4 to my knowledge of General ISHIHARA's idea whilst hoping  
5 for the general -- generally for the construction of  
6 Japan's peace-time economy, he could not escape app-  
7 rehensions with regard to the pressure and menace of the  
8 Soviet Union and the need for securing the Japanese --  
9 the national defense of Japan vis-a-vis that menace;  
10 and then, furthermore, that he was very much interested  
11 and concerned with preservation of Manchukuo. In  
12 accordance with this hope, it was General ISHIHARA's  
13 idea to replenish the national defense power of Japan  
14 as against the Soviet Union in order that that national  
15 defense might be secure against that power without  
16 fighting.

17 With respect to China it was his hope and desire  
18 to every extent possible to promote intimate friendly  
19 relations on the basis of the good neighbor principle.  
20 That is my understanding, yes, and I have heard him  
21 say many times after the outbreak of the Marco Polo  
22 Bridge Incident that we must exercise every patience  
23 and restraint with respect to that affair.

24 BRIGADIER QUILLIAM: May it please the Tribunal,  
25 it is submitted that this type of evidence is objectionable.

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1 The general staff plan has not be produced and we have  
2 been given now an account of General ISHIHARA's alleged  
3 statement with reference to the object of the written  
4 document.

5 MR. S. OKAMOTO: I merely went in very thoroughly  
6 into the motives and the purpose of the plans given  
7 in Court exhibit 842.

8 THE PRESIDENT: The objection is upheld.  
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1 Q I shall change my question. How did the  
2 cabinet dispose of the plan submitted by the army with  
3 reference to the five year plan?

4 A The cabinet immediately gave close scrutiny  
5 and study to the plan but the China Incident suddenly  
6 broke out at that time. At first, however, it was  
7 unavoidably necessary for the cabinet to give due  
8 consideration and study to the matter of adjusting  
9 imports in the light of Japan's peculiar and special  
10 position with respect to trade. Among the items  
11 which became necessary with the increase in the number  
12 of forces mobilized and sent out to mobilize Japanese  
13 war materials to a very great extent. It was necessary  
14 to effect the mobilization of war materials -- as a  
15 result of this increase in the number of personnel  
16 mobilization a very voluminous material mobilization  
17 for military purposes became necessary. When the  
18 demand for material was made it was around October  
19 or the end of October 1937. At this time it wasn't  
20 sufficient merely to adjust imports, the volume of  
21 imports; the supply of materials as a whole needed  
22 to be adjusted. At that time this was called the  
23 Material Supply Plan, and this plan, with the exten-  
24 sion of the Incident, developed into the Materials  
25 Mobilization plan. Altogether in relation with this



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1 mobilization plan various other very complicated and  
2 extensive plans were called for. Such being the  
3 situation, the study and consideration of the five  
4 year plan submitted by the army did not progress.  
5 Despite the fact that the army asked that the industrial  
6 expansion plan be started from the year 1937, that  
7 year ended without anything being done with respect  
8 to that plan and, therefore, the four year plan went  
9 into effect in the following year, that is, 1938, but  
10 even at the outset of the year 1938 nothing was done  
11 about this plan, that is, nothing -- at the start of  
12 the year nothing was done with respect to organizing  
13 the entire four year plan. Hence, the mobilization  
14 plan with respect to the year 1938 was started only  
15 as an annual plan limited only to that year. Such  
16 being the case the entire four year plan was not  
17 organized as a coordinated four year plan until the  
18 end of the four year period, in other words, the 11th  
19 of July, 1939-- correction: January 17, 1939, by a  
20 cabinet decision. The fact that a five year plan  
21 had been reduced to a four year plan and that this  
22 four year plan was not completely organized until the  
23 end of that four year period indicates how at the  
24 outset of the plan plans were disorganized.

25 Q Is this point made clear in any of the

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1 chapters of Court Exhibit 842?

2 A The fact that part one was completed --  
3 the date of the completion of part 1 is indicated  
4 in the exhibit, the date being 29 May 1937, and part 3  
5 was decided on by the cabinet in January 1939. This  
6 also is indicated in this exhibit. And the annual  
7 schedule is -- of production is indicated in a chart  
8 following page 3 in the exhibit, beginning in the year  
9 1938.

10 Q How was it in the case of Manchuria?

11 A Part 1 is in connection with Japan and  
12 Manchuria together, whereas part 3 concerns Japan  
13 only. When the War Ministry made a request of the  
14 Japanese government with respect to this plan it  
15 also made the following request -- gave the following  
16 instructions to the Kwantung Army in Manchuria. In  
17 other words, the War Ministry in Tokyo instructed the  
18 Kwantung Army to contact and consult with the Manchukuo  
19 Government in order to bring about the realization of  
20 the plan.

21 Q What did the Manchukuo Government do about  
22 it?

23 A The Manchukuo Government gave this proposal  
24 immediate study and, supplement it with requirements  
25 peculiar to Manchukuo, it formulated the Manchukuo --

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DIRECT

1 it formulated the Manchukuo five year industrial  
2 plan which was initiated, that is, inaugurated in  
3 1937.

4 Q As regards the economic exploitation of North  
5 China, development of North China, will you please give  
6 the explanation so as to enable us to understand the  
7 whole thing, yes or no?

8 THE MONITOR: Can you simply by answering  
9 yes or no tell us whether these plans included the  
10 economic development of North China?

11 A Of course, the obtaining of natural resources  
12 and raw materials was expected from that area, but  
13 the development of that area was not included or con-  
14 sidered in this plan.

15 Q I can understand that by the effect of the  
16 China Affair the plan embodied in Court exhibit 842  
17 was delayed in its execution, but why was its scope  
18 reduced?

19 A Prior to the China Incident the army require-  
20 ment of ordinary steel was 20,000 tons a year. However,  
21 with the outbreak of the China Incident the require-  
22 ment jumped to over 200,000 tons in the latter half  
23 of 1937 and to over 600,000 tons in 1938. The peak  
24 of requirement was reached -- when the peak of the  
25 requirement was reached the figure was 980,000 tons.



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1 The Navy demand of this product also increased. Iron  
2 was also greatly needed by civilian industries in  
3 connection with the construction of a larger number  
4 of factorites in Japan in accordance with the demands  
5 of the army and navy. Because of the fact that such  
6 a situation was not anticipated at first, the  
7 belief was that no more than 20,000 tons or a few  
8 tens of thousands of tons was necessary for the pur-  
9 pose of military replenishment. However, because of  
10 the fact that such large amounts of iron and steel  
11 became necessary it was unavoidable that a sufficient  
12 quantity of this product could not be channeled into --  
13 could not be channeled for the purpose of industrial --  
14 for the industrial plans in general.

15 THE PRESIDENT: Have you much more?

16 MR. S. OKAMOTO: I should think I would  
17 need about fifteen minutes more.

18 THE PRESIDENT: Fifteen minutes. We will  
19 recess until half past one.

20 (Whereupon, at 1200, a recess was  
21 taken.)  
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## 1 AFTERNOON SESSION

2  
3 The Tribunal met, pursuant to  
4 recess, at 1330.5 MARSHAL OF THE COURT: The International  
6 Military Tribunal for the Far East is now resumed.

7 THE PRESIDENT: Mr. OKAMOTO.

8 - - - -

9 K I K U S A B U R O O K A D A, called as a  
10 witness on behalf of the defense, resumed  
11 the stand and testified through Japanese  
12 interpreters as follows:

## 13 DIRECT EXAMINATION

14 BY MR. S. OKAMOTO (Continued):

15 Q Mr. Witness, will you continue to answer the  
16 question which was put to you before the noon recess?17 A This morning I spoke of the fact that the  
18 expansion plan for important industries could not be  
19 continued because of the attrition in the army and  
20 navy stocks of supplies; and, therefore, at the outset  
21 of the execution of the plan, of the original plan,  
22 the goal was either reached -- or the goal was nearly  
23 approached or surpassed only in connection with special  
24 industries, light metal industries, machine tool  
25 industry and the automotive industry. Excuse me --

OKADA

DIRECT

1 instead of special industry, special steel industry.  
2 In connection with the other industries, an incom-  
3 parable sacrifice was suffered. The greatest handicap  
4 was experienced by the synthetic oil industry. The  
5 electric power industry and the building of train  
6 coaches also suffered great handicap, unavoidable  
7 handicaps. The chemical industries also likewise  
8 suffered a great loss. General speaking, only the  
9 machine industries which have some relationship to  
10 such direct war industries as the manufacture of arms  
11 and planes achieved any measure of success.

12 THE MONITOR: Slight correction: Generally,  
13 only those industries which were closest to the  
14 manufacturing of arms and airplanes -- for instance,  
15 the machine industry -- managed to expand or grow.

16 A (Continuing) And, therefore, the original  
17 intention to overcome Japan's most -- the greatest  
18 handicap, that is, the lack in supply of raw  
19 materials, the effort to overcome this handicap was  
20 in vain.

21 Q I have only one point left. Can you point out  
22 by quoting a passage from exhibit No. 842 that the  
23 plan set forth therein was not in preparation for the  
24 Pacific War?  
25

A I can so point out from two points.

OKADA

DIRECT

1 THE PRESIDENT: Another opinion, but let it go.  
2 It will save time to listen to it and then disregard  
3 it.

4 Q Please try not to express your opinion but  
5 point out facts from this affidavit -- from this  
6 document.

7 THE PRESIDENT: You invited him to express  
8 an opinion.

9 A One point is the goal in the production of  
10 synthetic oil as expressed in figures. Another point  
11 is with respect to the speedy and epical efforts to  
12 bring about self-supply in raw materials without having  
13 to depend upon imports, which is so stipulated in  
14 this exhibit.

15 Q Would you add a brief explanation to your  
16 statement, because it does not fully explain what  
17 you want to say.

18 A In order to prosecute the China Affair to  
19 the extent of its scope as of 1941, the consumption  
20 of petroleum would be as follows: aviation gasoline  
21 and ordinary gasoline, 230,000 kiloliters, and  
22 1,050,000 kiloliters of heavy oil. The production  
23 goal for gasoline in the last fiscal year of this  
24 plan was, for Japan with respect of gasoline,  
25 290,000 kiloliters; Manchuria, 330,000 kiloliters;



OKADA

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1 crude oil in Japan, 850,000 kiloliters; and Manchuria,  
2 280,000 kiloliters -- 180,000 kiloliters.

3 Q What do you mean by "try not to depend as much  
4 as possible on outside supplies"?

5 A Which means that even in wartime the necessary  
6 imports of war materials would be continued. That is,  
7 to continue imports from the outside but not as --  
8 to continue imports from the outside as much as  
9 possible, and that is because Japan relied for its  
10 supply of these materials to the Anglo-American bloc  
11 and, therefore, materials would, as before, have to  
12 be relied upon for supply from this bloc.  
13

14 MR. S. OKAMOTO: I conclude my examination.  
15 The prosecution is free to cross-examine him.

16 THE PRESIDENT: Brigadier Quilliam.

17 CROSS-EXAMINATION

18 BY BRIGADIER QUILLIAM:

19 Q Witness, you told us yesterday that the plan,  
20 exhibit 841, was not shown to any other ministries.  
21 Do you say that it was not shown to any ministry -- any  
22 other ministry?

23 A You are referring to exhibit 841, sir?

24 Q 841.

25 A It was not shown to other ministries.

BRIGADIER QUILLIAM: All right. I ask that



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CROSS

1 exhibit 2227 be handed to the witness, if it please  
2 your Honor.

3 (Whereupon, a document was handed  
4 to the witness.)

5 THE MONITOR: Brigadier Quilliam, can you  
6 give us the prosecution document number on that, sir?

7 BRIGADIER QUILLIAM: Prosecution No. 2946.

8 THE MONITOR: 2946. Thank you.

9 Q Now, Witness, you will see that that is a  
10 kind of summary or extract from the Five-Year Plan,  
11 exhibit 841.

12 A This is in reference to exhibit 842.

13 Q 842.

14 A The plan which I said was not shown to other  
15 ministries was that given in exhibit 841.

16 Q You notice that this is dated the tenth of  
17 June 1937? Do you notice that?

18 A I do.

19 Q Do you see that it is entitled an "Outline  
20 of Japanese Army's Five-Year Plan"?  
21

22 A Yes.  
23  
24  
25

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1 Q Do you not agree that it is really a report  
2 or summary from exhibit 841, the Army's Five Year  
3 Plan?

4 A I do not.

5 Q Very well. We will leave that for the Tri-  
6 bunal to judge.

7 Now, I want you to look at the last page,  
8 the memorandum to the accused HIROTA. Do you see  
9 what I mean?

10 A No, I do not understand yet. I cannot find  
11 the passage.

12 Q On the last page, the memorandum signed by  
13 AKIYAMA and addressed to HIROTA. Have you got it?

14 A Yes, I have.

15 Q Who is AKIYAMA?

16 A I do not know.

17 Q Now, if this plan is the plan in 841, you  
18 will see from this note, will you not, that it was  
19 shown to the other ministries?

20 I will read part of the note before you  
21 reply: "This report enclosed herewith is an extract  
22 from the note shown to me confidentially by the Army  
23 side. Every Ministry will set to make a draft through  
24 this line. And, as soon as the programs have been  
25 drafted, they should be submitted to the Cabinet

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1 Planning Board for execution."

2 Now, then, if this plan, if this is an out-  
3 line of the plan in exhibit 841, obviously the minis-  
4 ters knew, didn't they?

5 A You have used the word "if," assuming that  
6 it was done?

7 Q Yes.

8 A But will you be good enough to listen to my  
9 explanation?

10 Q What is your explanation?

11 A If you would note the subject matter in  
12 this outline of the army's five year plan you will  
13 note that it is an expansion plan for raw materials  
14 with respect to automobiles, machine tools, steel,  
15 petroleum, synthetic oil, pig iron, alcohol, coal,  
16 aluminum, magnesium.

17 Q And are not all those matters covered in  
18 exhibit 841?

19 A No. The items mentioned in exhibit 841 relate  
20 to aircraft, automobiles, tanks, arms, et cetera. The  
21 items which you have just mentioned are all mentioned  
22 in exhibit 842.

23  
24 The five year plans formulated by the army  
25 are two: One, contained in exhibit 841, relates to  
purely military items. Exhibit 842 relates to national



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CROSS

1 defense materials in general, and strategic materials,  
2 and relate principally to raw materials and fuel.

3 Q And you say that 842 was shown to all the  
4 ministries, but not 841?

5 A Yes.

6 Q I see. Now, Witness, you said yesterday that  
7 the date 1941 in these plans for the end of the period  
8 had no importance. Now, will you look at appendix 3  
9 of exhibit 841, appendix 3, which is page 21 in the  
10 English translation? I am referring to part 1,  
11 Witness. Do you observe at the top of the page, or  
12 at the beginning of the appendix: "Goal to be five  
13 years hence."

14 A Yes, I notice it.

15 Q Later on, lower down, it refers to total  
16 peace time operation capacity. Do you see that? You  
17 see that, do you?

18 A Yes, I notice it.

19 Q And then below that these words: "1942  
20 and thereafter, required war time capacity, first  
21 year?"

22 A Yes, I notice it.

23 Q Does that not indicate that when the plan  
24 was drawn up in 1937 it was anticipated that there  
25 would be a war by 1941?



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1 A It does not.

2 Q It does not. So when it talks about the  
3 first year of war time, what do you say that means?

4 A This means that army aircraft production  
5 in 1942 -- 1941, the expansion plan '42, the expansion  
6 plan for the 140 army companies, airplane  
7 squadrons, will be completed. Even though air corps  
8 companies could be organized, it would be meaningless  
9 unless they could be supplied with airplanes.

10 Q Witness, you are not answering my question.  
11 Don't those words mean plainly that 1942 was looked  
12 upon as being the first year of the war?

13 A It does not mean.

14 Q Very well. I am prepared to leave that to  
15 the Tribunal, too.

16 Now, will you turn to the part, it is page  
17 11 in the English translation, dealing with the ammunition  
18 industry. Have you got it, Witness?

19 THE MONITOR: Mr. President, the witness has  
20 the original but we have a mimeographed copy, and the  
21 pages don't seem to match. May I explain to him  
22 where to find the place?

23 THE PRESIDENT: Certainly.

24 Q Let me see if I can help the witness. If  
25 you look at number two, paragraph two, "Ammunition

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1 Industry including Bombs--"

2 A I have found this passage.

3 Q That is "Ammunition Industry including Bombs."

4 I want you to go to paragraph 5 of that, 5-C.

5 THE INTERPRETER: Yes, the witness has that  
6 passage, sir.

7 Q All right. Now, at the end of that paragraph  
8 are these words: "Moreover in the event of the out-  
9 break of hostilities during that said year, special  
10 message for the rapid replenishment of equipment will  
11 be devised." And the said year means 1941, doesn't  
12 it?

13 A This is in reference to 1942.  
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1 Q 1942? Did I understand you to say that  
2 refers to 1942?

3 A Yes, 1942.

4 Q I see. Do you still say that hostilities  
5 were not expected about 1942?

6 MR. LOGAN: If the Tribunal please, this  
7 witness has not been called as an expert as to his  
8 opinion as to when any event was to occur, and,  
9 furthermore, I notice a tendency on the part of the  
10 prosecution to stop this witness after being asked a  
11 question to explain why he has given certain answers.  
12 The prosecution has been shutting him off.

13 THE PRESIDENT: This merely goes to credit.

14 THE INTERPRETER: The witness just said,  
15 "May I be permitted to explain?"

16 THE PRESIDENT: I have not noticed any  
17 tendency to prevent his answering in a proper way.

18 BRIGADIER QUILLIAM: All I want ~~the~~ witness  
19 to do is, having seen that reference, to tell the  
20 Tribunal whether he still says that the year 1941  
21 mentioned in the plan has no significance.

22 THE WITNESS: I regret exceedingly that **you**  
23 are passing such judgment without permitting me to  
24 explain just what it means. As a matter of fact, I  
25 have not yet replied in respect to this question.

OKADA

CROSS

1 Q Witness, all I am asking you is this:  
2 Having seen that reference there, do you still say  
3 that the year 1941 in the plans has no significance?

4 A It is merely an estimate, and nothing more,  
5 whether in this year 1941 in the event hostilities  
6 opened between Japan and the Soviet Union whether or  
7 not Japan could supply sufficient aircraft to 140 air  
8 companies.

9 THE PRESIDENT: As it goes to credit only,  
10 I think we have heard enough, Brigadier.

11 BRIGADIER QUILLIAM: Yes, I have been  
12 thinking that.

13 Q Witness, I want to deal with another subject  
14 now. Mr. Liebert, in his evidence, told us about a  
15 number of measures, laws, and ordinances relating to  
16 industrial matters passed after June, 1937, and I  
17 remind you of some of them. There was the Imperial  
18 Fuel Development Company Law, August, 1937; the Iron  
19 Manufacturing Industrial Law, August, 1937; the Oil  
20 Resources Exploitation Law, March, 1938; an Act to  
21 Promote the Production of Important Minerals, of  
22 March, 1938, and there were many others, were there not?

23 A Before dealing with this question I  
24 should like to settle the question with respect to  
25 the year 1942.



OKADA

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1 THE PRESIDENT: You answer questions.

2 BRIGADIER QUILLIAM: May it please your  
3 Honor, I prefer not to question a witness of this  
4 kind. I will conclude my cross-examination.

5 THE PRESIDENT: Mr. OKAMOTO.

6 - - -

7 REDIRECT EXAMINATION

8 BY MR. S. OKAMOTO:

9 Q Witness, the question put to you by the  
10 prosecutor just now was a very simple one. He  
11 merely asked you if the year 1942 was not considered  
12 as the first year of hostilities, as it is written in  
13 one of those documents; that the year, 17th year of  
14 Showa, that is, 1942 is the first wartime year.

15 BRIGADIER QUILLIAM: May it please your  
16 Honor, I submit that is not a proper question in re-  
17 direct examination. It is an admonition to the  
18 witness.

19 THE PRESIDENT: It is an appeal to the witness  
20 not to be stupid, but to give to Mr. OKAMOTO the  
21 answer he should have given to the Brigadier. We do  
22 not want to hear the answer at this stage.

23 The objection is upheld.

24 Q Then I shall reframe my question and ask you  
25 in this way. The words, "the first year of hostilities,"

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1 does that -- do those words mean -- are used cus-  
2 tomarily for matters relating to operations? Are  
3 they customarily used for the purpose of formulating  
4 an operation plan?

5 THE INTERPRETER: The witness replied "Yes."

6 BRIGADIER QUILLIAM: And now, may it please  
7 your Honor, the question is a grossly leading one.

8 THE PRESIDENT: The chance is it will be  
9 disallowed in any case.

10 THE WITNESS: I feel it is extremely  
11 regrettable that this most important question has  
12 been disallowed.

13 THE PRESIDENT: I think we will have to  
14 deal with this Japanese Major General. He is not  
15 addressing the Japanese Army now.

16 MARSHAL OF THE COURT: Order in the court.

17 THE MONITOR: Before that, the Japanese  
18 counsel replied to the witness that the objection  
19 disallowed was not directed against the question but  
20 against the objection by the prosecution.

21 Q Did you write those words yourself, that is,  
22 "first year of hostilities," as appear in this docu-  
23 ment?  
24

25 A Yes, I wrote it myself.

Q Was it written in accordance with an

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1 instruction that you received from your superiors?

2 A It was no more than a consideration of  
3 whether or not when the replenishment of aircraft --  
4 the plans for replenishment of aircraft was com-  
5 pleted whether the air companies could be sufficiently  
6 supplied with aircraft.

7 THE MONITOR: Slight correction. When the  
8 organization of the aircraft squadrons and such were  
9 completed, can the supply be replenished?

10 Q Now, turning to the last fiscal year of  
11 this plan, was it anticipated that this plan would  
12 be continued further or extended?

13 A Plans were formulated, as shown in exhibit  
14 841, to extend to the year 1943, and therefore there  
15 is no deep significance with respect to the end of  
16 the year 1941.

17 Q Was a renewal of the plan expected?

18 A Yes.  
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1 THE PRESIDENT: I do not understand that at  
2 any stage I refused to allow Mr. OKAMOTO to get out  
3 of the witness the explanation of any answer he gave  
4 in cross-examination. If I did I was wrong but I  
5 do not understand that I did.

6 Mr. OKAMOTO, do you understand that I pre-  
7 vented you from getting the witness to explain any  
8 answer he gave in cross-examination. There is, of  
9 course, a limit to any such explanation. You are not  
10 allowed to explain the obvious.

11 MR. S. OKAMOTO: I had thought that I would be  
12 permitted to clarify certain questions which had not  
13 been clarified in the course of the cross-examination;  
14 however, it may have been my misunderstanding. I am  
15 not sure whether it is a misunderstanding or not.

16 THE PRESIDENT: Put the question you think  
17 you were wrongly prevented from putting.

18 MR. S. OKAMOTO: I felt that it was unfair for  
19 the prosecution to point out various passages in the  
20 document which refer to the "first year of war" and  
21 not permit the very man who formulated these plans  
22 to make an explanation of the meaning of those words.  
23 The witness has not yet clarified that point.

24 THE PRESIDENT: What was the expression again?  
25 I recollect some of it. You suggested it had a . . .



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1 technical meaning, I thought. It refers to the  
2 first year of war.

3 MR. S. OKAMOTO: Yes. All I want to ask of  
4 this witness is whether or not in formulating an  
5 operational plan such words as the "first wartime  
6 year" is not customarily used as a technical term with  
7 respect to the formulation of such plans.

8 THE PRESIDENT: The witness may answer.  
9 There is no objection.

10 Q Please explain.

11 THE INTERPRETER: I have asked him to speak  
12 slowly.

13 A At one time I was a secretary in the Board  
14 of Natural Resources of the Cabinet which was the  
15 forerunner of the Planning Board; and at that time I  
16 participated in the drafting of the Second Period  
17 National Mobilization Plan.

18 THE PRESIDENT: Do you regard that as an  
19 answer?

20 The Brigadier was well within his rights in  
21 objecting, in the first place, to this man's explaining  
22 terms which have only one meaning but he has allowed  
23 this question to be put and now we have no answer to  
24 it. There is no attempt to answer the question.

25 THE WITNESS: I am about to answer that

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1 question, your Honor.

2 Q Then answer as briefly and simply as  
3 possible, Mr. Witness.

4 A And at that time the plan was formulated  
5 with 1935 as the first wartime year and 1911 as the  
6 second wartime year. Even before that the First  
7 Period National Mobilization Plan was drawn up in  
8 1933 with that year as the first wartime year and  
9 1934 as the second wartime year.

10 THE PRESIDENT: We still have no answer;  
11 no attempt to answer.

12 Q I am asking you, Mr. Witness, not to give  
13 any illustration but to give as briefly and simply  
14 as possible how this particular word is used in  
15 drawing up an operations plan.

16 THE MONITOR: What the technical meaning of  
17 the term "wartime year" is in military use. That is  
18 what I am asking.

19 BRIGADIER QUILLIAM: May it please your Honor,  
20 I am very reluctant to interfere -- interrupt Japanese  
21 counsel too much but I submit that this type of  
22 questioning is most objectionable.

23 THE PRESIDENT: The counsel is doing his  
24 best. The witness is utterly impossible.

25 THE WITNESS: I am not impossible; I have not

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1 even said anything.

2 MARSHAL OF THE COURT: Order in the court.

3 THE PRESIDENT: I do not think we should  
4 hear this witness any further. I think we are well  
5 warranted -- indeed required -- in the interests of  
6 order in this court not to hear this man further.

7 MR.S. OKAMOTO: I will do my very best, your  
8 Honor, but will you permit me to ask just one small  
9 question, just one short question? I will do my  
10 utmost to have the witness answer as simply as possible.  
11 May it be permitted? It can be answered in one word.

12 THE WITNESS: Only a comparison of demand  
13 and supply was made on a hypothetical basis; that is  
14 all.

15 THE INTERPRETER: The Japanese Counsel:  
16 There is some misunderstanding in the words used  
17 inasmuch as the same words may have a different  
18 meaning. The Japanese counsel was just merely  
19 confirming that, asking him what he meant about the  
20 balance or comparison of demand and supply, to which  
21 the witness answered that it was merely an effort to  
22 balance supply and demand and see whether there would  
23 be any deficiencies one way or the other.

24 BRIGADIER QUILLIAM: It has been pointed out  
25 to me, your Honor, that for some time the witness and



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1 counsel have been exchanging remarks which have not  
2 been translated.

3 THE PRESIDENT: Well, you have asked that  
4 question and you have received an answer, I take it.

5 MR. S. OKAMOTO: I conclude my examination --  
6 re-examination, your Honor.

7 THE PRESIDENT: The witness is excused on  
8 the usual terms.

9 (Whereupon, the witness was excused.)

10 THE PRESIDENT: Mr. SHIOBARA.

11 MR. SHIOBARA: I am counsel SHIOBARA. I  
12 should like to have the witness ONO, Takeshi, called  
13 to the witness stand.

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1 T A K E S H I O N O, called as a witness on behalf  
2 of the defense, being first duly sworn, testified  
3 through Japanese interpreters as follows:

4 DIRECT EXAMINATION

5 BY MR. SHIOBARA:

6 Q Mr. Witness, will you please state your name,  
7 the year in which you were born and your present  
8 address -- the date of birth?

9 A My name is ONO, Takeshi. I was born at  
10 Takata-Machi, Nishi Kunisaki-Gun, Oita Prefecture. I  
11 graduated from the Imperial University in 1929. I  
12 graduated from the law college of the Tokyo Imperial  
13 University in May 1915; and in November of the same  
14 year I entered the Ministry of Communications. In  
15 July 1935 I became Director of the Mercantile Marine  
16 Bureau of the same ministry and then I was appointed  
17 Vice-Minister of Communications in January 1938 and  
18 left the same post in March 1939.

19 Q Now I will show you the defense document  
20 No. 708. Will you please examine it and state whether  
21 it is your affidavit written by you?

22 A Yes, this affidavit was written by me.

23 MR. SHIOBARA: I tender in evidence defense  
24 document No. 708.  
25

THE PRESIDENT: Admitted on the usual terms.

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1 CLERK OF THE COURT: Defense document  
2 No. 708 will receive exhibit No. 2369.

3 (Whereupon, the document above  
4 referred to was marked defense exhibit  
5 No. 2369 and received in evidence.)

6 MR. SHIOBARA: I should now like to read  
7 exhibit 2369, omitting such passages as I regard to  
8 be opinions. (Reading):

9 "It is a well-known fact that Japan, ever  
10 since the Meiji Restoration, adopted a policy of  
11 encouragement and promotion of every phase of her  
12 industry in order to catch up, in some way or other,  
13 with the advanced countries in Europe and America.  
14 Being surrounded by sea on all sides and favored  
15 with other suitable conditions, Japan had special  
16 advantage for developing her marine transportation  
17 and ship building."--

18 THE INTERPRETER: I am reading from  
19 paragraph 3, page 1 of the affidavit.  
20

21 THE PRESIDENT: Mr. SHIOBARA, we will recess  
22 for fifteen minutes.

23 (Whereupon, at 1445 a recess was  
24 taken until 1500, after which the proceedings  
25 were resumed as follows:)



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1 MARSHAL OF THE COURT: The International  
2 Military Tribunal for the Far East is now resumed.

3 THE PRESIDENT: Mr. SHIOBARA.

4 MR. SHIOBARA: I shall resume reading the  
5 last sentence on Page 1.

6 "However, due to her national isolation during  
7 the TOKUGAWA period, a policy was adopted to prohibit  
8 the building of larger-type sea-going vessels and  
9 foreign navigation so that Japan held the lowest rank  
10 in this respect. In other words, there was almost  
11 nothing in existence with respect to this field which  
12 was worthy of mention. It is only natural, therefore,  
13 that the Japanese Government should have paid special  
14 efforts for the new establishment and encouragement  
15 of these enterprises. It was after 1887 that laws  
16 concerning these efforts were promulgated and the  
17 Ship-Building Encouragement Law and the Ocean Navi-  
18 gation Subsidy Law came into being. These two laws  
19 were enforced throughout the TAISHO and the early part  
20 of the SHOWA periods, which encouraged and subsidized  
21 the building and commissioning of larger type vessels  
22 which were considered superior at that time."

23 We shall now skip eight lines.

24 "As a result of such measures these enter-  
25 prises developed remarkably and the total gross tonnage

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1 of vessels at the beginning of SHOWA (1926) amounted to  
2 4,000,000 tons and the volume of foreign goods obtained  
3 by these means was so good as to come next to the export  
4 volume of raw silk and raw cotton.

5 "Under the circumstances as mentioned above,  
6 the scrap and build system which was put into effect in  
7 October, 1932, and other similar measures were aimed  
8 primarily at the promotion of the development of Japan's  
9 industries which had so far continued to develop from  
10 the previous period.

11 "3. The Scrap and Build System.

12 "The worldwide economic depression after  
13 World War I affected Japan by degrees. Japan's shipping  
14 and ship-building industries met with extremely adverse  
15 circumstances from the end of the TAISHO era till  
16 the beginning of the SHOWA era.

17 "Since the early days, Japan's shipping  
18 industry was developed by importing old ships from  
19 abroad until her shipping came to rank third in the  
20 world. The majority of these ships, however, were  
21 either outmoded ships or inferior vessels hastily  
22 constructed during wartime. Japan was then called a  
23 country next to Greece in the ownership of outmoded  
24 ships (see the appended Table I).

25 "This fact not only interfered considerably



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1 with the efficient operation of her shipping, but also  
2 gave rise to frequent disasters at sea (see the appended  
3 Table II) around the end of the TAISHO era or at the  
4 beginning of the SHOWA era. An unusually great loss of  
5 human lives involved in these disasters brought about  
6 severe criticisms against the Governmental policy of  
7 employing old ships. Thus the financial depression  
8 dealt a severe blow on Japan's shipping, --"

9 I will omit reading Tables No. I and No. II  
10 and I will content myself by pointing out only the  
11 points to which I wish to draw the attention of the  
12 Tribunal.

13 THE PRESIDENT: Mr. SHIOBARA, we are not  
14 hearing a word in English at present.

15 THE MONITOR: Mr. President, he is now  
16 commenting, and he is away from his prepared text.  
17 We are waiting for him to finish his sentence so that  
18 we can translate. He is referring to Appendix One  
19 or Table I.

20 MR. SHIOBARA (Continuing): I should like  
21 to point out, if the Tribunal please, just the total  
22 figures to explain the volume or the amount of old or  
23 superannuated ships in Japan's possession. If you  
24 will refer to the total at the lower right-hand  
25 corner, you will find that the total tonnage of

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1 Japanese ships was 4,186,652 tons; and two columns  
2 to the left of that gives the figure 925,477 tons  
3 showing how many ships Japan owned which were more  
4 than twenty-five years old.

5 We return next to Table II-A. That is  
6 the table showing the loss of human lives (dead  
7 and missing) due to disasters at sea between 1924  
8 and 1930, a period of eight years. And I refer the  
9 Tribunal to the total given at the next-to-the-last  
10 line and also to the average total given in the last  
11 line lower right-hand corner. This table shows that  
12 in a period of seven years 2,955 lives were lost or  
13 an annual average of 422.

14 Next, Table II-B, showing the percentage  
15 of total loss of Japanese vessels of over one hundred  
16 tons. I refer the Tribunal to the last line, average,  
17 total number of ship losses, average, 39.3 per cent;  
18 percentage against number of ships owned, 1.97 per cent;  
19 given in tonnage, 57,126 tons; percentage against the  
20 total tonnage owned, 1.55 per cent.

21 THE PRESIDENT: That 39.3 is not a percentage  
22 but a total.

23 THE MONITOR: Mistranslation, your Honor.

24 MR. SHIOBARA: We begin at the top of page  
25 4:

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1 "Thus the financial depression dealt a severe  
2 blow on Japan's shipping, till the coal freight between  
3 Moji and Yokohama was reduced to an unprecedentedly  
4 low rate of 75 sen, and the lumber freight to North  
5 America to \$6. The number of laid-up ships increased  
6 to such an extent (see the appended Table III) that  
7 no other measures could be found.

8 "In the last analysis the excessive ship  
9 tonnage and inferior quality of ships brought about  
10 this condition. Public opinion demanded, accordingly,  
11 that the Government should at once carry out a thorough-  
12 going readjustment of surplus ship tonnage and improve-  
13 ment in the grade of ships employed, thereby improving  
14 the condition of the shipping trade and eradicating  
15 the very cause of disasters at sea.

16 "Because of excess ship tonnage, ship  
17 builders received no orders for the construction of  
18 new vessels. This caused ship building facilities  
19 to remain permanently idle. The ship builders were  
20 strongly urged to rationalize the industry. They were  
21 obliged to resort to such temporizing measures as  
22 the construction of steel bridges, or in extreme cases,  
23 the manufacturing of daily necessities such as furni-  
24 ture, wooden clogs, and other articles. A large  
25 number of workers lost employment in the ship building



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1 and affiliated industries, and to give them relief  
2 became an urgent necessity.

3 "The measure in question was proposed and  
4 put into effect in view of such circumstances, after  
5 due consultation with national ship owners' association,  
6 ship builders association, as well as labor organiza-  
7 tions including seamen's unions.

8 "The measure aims at:

9 "(a) improvement of the condition of the  
10 shipping trade;

11 "(b) rationalization of shipping and the  
12 prevention of disasters at sea by the employment of  
13 ships of better grade;

14 "(c) development of the ship building  
15 industry and giving relief to the unemployed by  
16 additional construction of ships.

17 "When the measures were put into effect,  
18 the economic objectives were attained and shipping  
19 and ship building industries gradually recovered from  
20 the depression. The attention of the powers was drawn  
21 to Japan's success and both England and Norway adopted  
22 similar measures."

23 We now skip five lines to the paragraph  
24 marked "A".

25 "A. A policy aiming at the reduction of ship



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1 bottom is rather contrary to war objectives. In fact,  
2 at the outset, the military was opposed to it. The  
3 measure resulted in scrapping 500,000 gross tons of old  
4 ships and building 300,000 gross tons of new ones.  
5 In addition to this, importation of foreign vessels  
6 was banned in May, 1933.

7 "These facts demonstrate clearly that what  
8 the Government had intended was an out and out eco-  
9 nomic measure to improve the shipping trade by  
10 getting rid of surplus ship tonnage. That Japan's  
11 ship bottoms were actually reduced by the operation  
12 of the measure in question is shown in the appended  
13 Table IV.

14 "B. The measure aimed at the improvement  
15 of the grade of ships owned by Japan. However, what  
16 the Government intended was superior economic per-  
17 formance of individual ships according to the manner  
18 of their employment and speed. For instance, the  
19 Government-required full speed for ships of 4,000  
20 gross tons or over was usually but 13.5 knots. It  
21 is clear, therefore, that the Government did not  
22 have high-grade ships of specially high-speed built  
23 in anticipation of a war. In certain quarters it  
24 has been alleged that Japan constructed ships for  
25 war purposes, because a considerable number of the

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1 newly built ships were of comparatively high speed  
2 in comparison with the cargo boats of other countries.

3 "The fact is that Japanese ships carrying  
4 silk directly to New York via the Panama Canal were  
5 required to have high speeds in order to compete with  
6 the American trans-continental railways. Their  
7 having high speed was an economic requirement. That  
8 a majority of ships built in conformity with this  
9 policy were commissioned for the New York route  
10 should clarify this point.

11 "C. The measure in question stipulated  
12 that ships should be built at domestic yards, using  
13 domestically produced materials.

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1 "This is the natural result of the fact  
2 that the policy was a measure to relieve unemployment."  
3 "We omit the rest of that sentence.

4 "4. As a result, the shipping business was  
5 improved, excess of space remedied and ship building  
6 enterprises well under way to recovery.

7 "Therefore, after the 12th year of Showa  
8 (1937) this was abolished, and the construction of  
9 up-to-date ships was resumed. This, however, was  
10 but the materialization, with a limited amount of  
11 subsidies, of the long sustained wishes of those con-  
12 cerned which had not been realized. Competition for  
13 the Atlantic shipping among Great Britain, the United  
14 States, France, Germany, Italy and others, which  
15 vied with each other in building ultra-modern ships  
16 was of common knowledge to the world and had been  
17 the envy of the Japanese shipping concerns. It was  
18 quite natural for Japan, which was the third shipping  
19 nation in the world, to attempt the building of ships  
20 which surpassed them.

21 "5. Policy of subsidizing ship building  
22 under the Iron Manufacturing Enterprises Law.

23 "Steel used for ship building in Japan was  
24 imported first but later the imported steel was  
25 replaced by home manufactured steel as iron

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1 manufacturing industries developed in Japan. At  
2 the time imported steel was used, ship builders  
3 were requested to use steel of approximately the  
4 same price as that used by foreign ship builders  
5 imported steel was excepted from import duty to  
6 prevent the comparatively high cost of ships, and  
7 simultaneously home manufactured steel was given a  
8 subsidy of a sum corresponding to the import duty.  
9 This policy was enforced from the twenties and this  
10 was stipulated in the Iron Manufacturing Encourage-  
11 ment Law. In 1937 this law was abolished to be  
12 replaced by the Iron Manufacturing Enterprises Law,  
13 when the foregoing provisions were transferred to  
14 the new law and the same stipulations were enforced."

15 Then we omit the next two lines and two words,  
16 and begin: "It was nothing more than the outcome  
17 of an economic demand to lower ship building costs to  
18 the level prevailing in Europe and the United States.

19 "6. The Iron Manufacturing Enterprise Law

20 The Iron Manufacturing Enterprise Law which  
21 was enacted and enforced at the end of 1939 was  
22 passed over the objections of the Navy for the pur-  
23 pose of preventing the supervision of ship building  
24 yards by the Navy. It stipulates the license system  
25 of ship building, etc., in conformance with the



general rule of supervision of other important industries. This is a matter to be placed, because of its nature, under control and aims at preventing unnecessary competition and confusion among the ship building concerns. Upon the enforcement of this law, the existing ship building yards were given licenses and thus the status quo was maintained. Although the provision for the grant of subsidies remained in the law, no subsidy was given under this law."

That is all.

At this point I should like to explain Table III and Table IV.

Table III is a table showing tonnage of vessels laid up. I should like to call the Tribunal's attention to the first line, December 1932, in respect of tonnage of vessels laid up. The figure is 237,322 tons.

And I also wish to refer the Tribunal to the remarks below, which states: It amounted to 330,000 tons during the period between the end of 1930 and the beginning of 1931.

And Table IV. I should like to point out on the basis of this table that the merchant ship tonnage decreased from the years 1931 to '35, and

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1 the curve went up slightly in 1936 for the first time.

2 This concludes my explanation of the tables  
3 appended to this affidavit.

4 I should like to be permitted to supplement  
5 this affidavit by this one question addressed to the  
6 witness:

7 BY MR. SHIOBARA (Continued):

8 Q Mr. Witness, was the question ever brought  
9 up at any conference whether this maritime -- marine  
10 transportation and ship building policy was in pre-  
11 paration for war?

12 A There was no occasion at which such a  
13 question was brought up.

14 MR. SHIOBARA: That concludes my examination.  
15 The prosecution may cross-examine this witness.

16 THE PRESIDENT: Brigadier Quilliam.

17 BRIGADIER QUILLIAM: May it please your  
18 Honor, we have no questions.

19 THE PRESIDENT: The witness is released on  
20 the usual terms.

21 (Whereupon, the witness  
22 was excused.)

23 MR. KAINO: I should like to call MAYAMA,  
24 Kwanji.

25 THE PRESIDENT: Who are you representing?



1 MR. KAINO: I represent the accused SUZUKI.

2 THE PRESIDENT: That is your name?

3 MR. KAINO: My name is KAINO.

4 THE PRESIDENT: Mr. KAINO.

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MAYAMA

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1 K W A N J I M A Y A M A, called as a witness on  
2 behalf of the defense, being first duly sworn,  
3 testified through the Japanese interpreter as  
4 follows:

## DIRECT EXAMINATION

6 BY MR. KAINO:

7 Q What is your name?

8 A MAYAMA, Kwanji.

9 Q Your personal history?

10 A Research secretary, Planning Board.

11 THE PRESIDENT: What is your address?

12 A Number 584, Kamayama, 1 Chome, Setagaya  
13 Ward, Tokyo.14 Q What were your functions at the Planning  
15 Board?16 A The establishment of materials, mobiliza-  
17 tion and plans, and plans for each quarter period of  
18 the year.19 Q What was the material -- what do you mean  
20 by the material mobilization plan?21 A The task entails the making of an estimate  
22 of supply of materials and to -- on the basis of the  
23 estimate, to supply them to various quarters requir-  
24 ing them. That is, to allocate the stock on hand.

25 Q I shall show you a document.

MAYAMA

DIRECT

1 (Whereupon, a document was  
2 handed to the witness.)

3 Will you look at part three of the document,  
4 which is exhibit 842? It is entitled: Outline of  
5 the plan for the expansion of productive power,  
6 decided by Cabinet conference January 1939.

7 A Yes, I notice those words.  
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1 Q Do you recognize it? Are you familiar with  
2 this document?

3 A Yes, I know that this plan was being formu-  
4 lated with respect to the expansion of productive power  
5 in the Planning Board when I was engaged in that work  
6 in that board.

7 Q Was the Material Mobilization Plan of which  
8 your are in charge made in order to attain the objects  
9 as set out in this document?

10 A This requires some explanation.

11 Q Please explain as briefly as possible.

12 A A consideration of this document which gives  
13 the outline for the war production plan for expansion  
14 of production, it would be thusly from the standpoint  
15 of one such as I who was in charge of a branch of that  
16 plan: Conclusion 1, this plan is a very loose one  
17 and hypothetical, idealistic. As a result of this plan  
18 being carried into effect it was behind by two years.  
19 Even after two years there were items impossible of  
20 execution. That is point 3. Reasons therefore:  
21 According to this chart there are the following defects:  
22 1. If this plan was to take effect in the fiscal  
23 year 1939 then in accordance with this plan there  
24 should have been another plan already in execution  
25 in the previous year, namely, in 1938. Such a plan



MAYAMA

DIRECT

1 does not exist and this plan was formulated in  
2 January of the 1939 fiscal year.

3 Point 2. With respect to figures as indicated  
4 in this plan there is no distinction made whether the  
5 goal is for plant installations or for production --  
6 whether it gives the production goal or the goal to  
7 be achieved with respect to plant installations. In  
8 order to execute this plan the following factors are  
9 missing, namely, immediate or direct raw materials,  
10 subsidiary materials, and transportation.

11 Q At any rate do you mean to say that the  
12 Material Mobilization Plan was enforced not with the  
13 object of increasing production, expanding the pro-  
14 ductive power?

15 A No, the Material Mobilization Plan was not  
16 formulated to this end.

17 Q Then what was the purpose, if you can state  
18 it briefly?

19 A The Materials Mobilization Plan involved  
20 merely the power of supply and involved the adjustment  
21 and coordination of the power of supply and the alloca-  
22 tion of the supply.

23 Q What were the functions or the power of the  
24 Planning Board with respect to the allocation plan of  
25 which you testified?

MAYAMA

DIRECT

1       A    The business of the Planning Board is nothing  
2 more than coordination of this matter as it relates  
3 to the various ministries of the government.

4       Q    What do you mean by allocation -- what do  
5 you mean by coordination or adjustment?

6       A    With respect to supply power the various  
7 ministries concerned report to the Planning Board as  
8 to the schedule of possible supply in accordance with  
9 their peculiar conditions or circumstances, and,  
10 depending on the supply power as can be estimated from  
11 the reports given by the various ministries, the  
12 Planning Board sets up an estimate with regard to  
13 meeting the demands of the various ministries.

14       Q    What do you mean by meeting the demand?

15       A    For instance, if any demand or request comes  
16 from the army or navy departments it may be that their  
17 demands are far beyond the supply on hand or supply  
18 available. In that case the various ministries of  
19 the government are consulted and the allocation of  
20 the limited amount of supply is there adjusted.

21       Q    What happens if no agreement or settlement  
22 is reached as a result of inter-ministry consultations?

23       A    No Materials Mobilization Plan can be  
24 established as long as there is no agreement among the  
25 various ministries.



MAYAMA

DIRECT

1 Q When the various ministries made a demand  
2 on allocation to the Planning Board did these various  
3 ministries clearly state the purpose to which they  
4 intended to use the particular material they desired?

5 A Yes, detailed explanations or indications  
6 are given by all the ministries except the Army and  
7 the Navy Departments.

8 Q Why did not the Army and Navy Ministries state  
9 clearly the reasons?

10 A Because it involved military secrets.

11 Q Was there any legal basis which prohibited  
12 a clear statement of matters concerning naval and  
13 military secrets?

14 A There is a military secrets protection law.

15 Q What kind of materials did the Material  
16 Mobilization Plan cover?

17 A Generally about four hundred items.

18 Q What were the main important items?

19 A Whatever the year in which any plan is drawn  
20 up the principal item, of course, is iron.

21 Q Now, do you recall the amount of steel materials  
22 demanded by various ministries and allocated to them?

23 A I don't have any definite recollection because  
24 the demands of the various ministries were extremely  
25 complex and voluminous. However, I do recall the out-  
line of the allocation.



MAYAMA

DIRECT

1 Q Then, will you sum up the allocation roughly  
2 with main emphasis on the navy and army allocations.

3 A With respect to steel allocations the conditions  
4 were extremely complicated because of the existence  
5 of distribution control and it is therefore natural  
6 that there would be differences in the figures allocated,  
7 depending on the year in which the allocation is made.

8 THE MONITOR: Differences in the nature of the  
9 figures.

10 A (Continuing) The amount of steel allocated to  
11 the army and navy during the 1938 fiscal year was  
12 1,250,000 tons.

13 Q Do you mean the year 1938?

14 A Yes. In 1939 there was an increase of nearly  
15 200,000 tons, giving a total of about a million and a  
16 half tons. The total tonnage allocated in 1940 was  
17 1,650,00 and in 1941 it was approximately 1,850,000 tons.

18 Q You have testified a while ago that circumstances  
19 were different. Would you explain briefly the difference  
20 of the circumstances?

21 A First, in mentioning the various different  
22 circumstances I would mention the affiliated munitions  
23 industries, which, if I should explain further, means  
24 the construction of roads and sewerage with respect  
25 to the building of aircraft manufacturing plants.

MAYAMA

DIRECT

1 THE MONITOR: As one of the illustrations.

2 A (Continuing) At the outset these materials  
3 were supplied by civilian sources. With the advance of  
4 each fiscal year the supply became increasingly difficult  
5 and therefore the allocations were considered by  
6 including all such matters under the general allocations  
7 for the army and navy, and the increase of 200,000 or  
8 300,000 each year naturally includes -- and naturally  
9 the increase of 200,000 or 300,000 tons each year in-  
10 cluded all civilian supplies which were taken into  
11 account, and, therefore, the demand for steel in the  
12 various years shows no very noticeable change. Therefore,  
13 there is hardly any noticeable change in the supply power  
14 of steel each year.

15 THE MONITOR: Total supply capacity of each  
16 year.

17 A (Continuing) Therefore, as a plan the figures  
18 generally are around 4,800,000 tons to 5,000,000 tons,  
19 and, with respect to this plan, in the light of various  
20 domestic conditions there was a general decrease of  
21 about 10 to 20 per cent. And, therefore, this decrease  
22 has also affected the allocation to the army and the  
23 navy as well -- this decrease in production. Such being  
24 the conditions the other branches of industry also have  
25 been under considerable restriction or limitation of



MAYAMA

DIRECT

1 material supply.

2 Q Go on.

3 A Generally, with respect to the army and navy  
4 peace-time demand of steel in such years as 1939 to 1941,  
5 the total demand placed by the army and navy with regard  
6 to this product was about 250,000,000 tons to 3,000,000  
7 tons.

8 THE PRESIDENT: Two and a half million to  
9 three million.

10 THE MONITOR: Yes, sir. That is right.

11 A (Continuing) And for these circumstances only  
12 about 50 to 60 per cent of the amount demanded by the  
13 army and navy could be allocated to these two branches,  
14 that is, in peace-time.

15 Q Was the iron to which you referred all produced  
16 in Japan?

17 A No.

18 Q Then, where were they produced, where were they  
19 obtained?

20 A What can be produced out of domestic iron ore  
21 is generally not more than 2,000,000 tons annually. As  
22 to the balance of two to three million tons which was  
23 necessary to meet domestic demands, it was necessary to  
24 import from the outside in the form of scrap iron, et  
25 cetera.



MAYAMA

DIRECT

1 Q Up to what year -- up to what period had  
2 the importation been planned?

3 A Not only with respect to scrap iron, but with  
4 respect to all materials, plans were drawn up up to  
5 July 7, 1941.

6 Q Do you recall anything with respect to plans  
7 for funds -- importation funds?

8 A There are two problems with respect to  
9 importation funds. At the outset of the Materials  
10 Mobilization Plan, because of the fact that Japanese  
11 domestic economy relied upon foreign trade and on foreign  
12 countries, the mobilization plan by this very fact had  
13 to consider also the allocation of foreign assets.  
14 With respect to the carrying into effect of this Materials  
15 Mobilization Plan, a very great difficulty was experienced  
16 because of the decrease in imports from year to year,  
17 and such import funds were calculated on the basis  
18 of f.o.b. prices.

19 THE PRESIDENT: Mr. KAINO, that is enough  
20 for this afternoon. We will adjourn until half-past  
21 nine tomorrow morning.

22 (Whereupon, at 1600, an adjournment  
23 was taken until Friday, March 14, 1947 at 0930.)  
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